

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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ULDERICO CALERO,

Civil No. 02 CV 10976

Plaintiff,

AUTOMATIC DISCLOSURE

-against-

Jury Demanded

ELRAC, INC., d/b/a ENTERPRISE-RENT-A-CAR,
and JESSICA ORTIZ,

Defendants.

-----X

Pursuant to Federal Rules of Civil Procedure Section 26(a)(1),
defendants, ELRAC, INC., d/b/a ENTERPRISE-RENT-A-CAR, and JESSICA
ORTIZ, by their attorneys, BRAND GLICK & BRAND, P.C., hereby set
forth the following upon information and belief:

PRELIMINARY STATEMENT

Defendants' investigation into the incident underlying this
lawsuit and discovery proceedings are continuing. These responses
represent the most complete information currently available to
defendant. Defendants reserve their right to supplement these
responses should additional information become available through
investigation and/or discovery proceedings:

(a) The name, and, if known, the address and telephone
number of each individual likely to have discoverable information
relevant to the disputed facts alleged with particularity in the
pleadings, identifying the subjects of the information:

1. The plaintiff;
2. The defendant;
3. Those additional persons listed on the police
report.

(b) A copy of, or a description by category and location of,
all documents, data, compilation, and tangible things in the
possession custody or control of the party that are relevant to
disputed facts alleged with particularity in the pleadings:

1. All medical records, reports, diagnostic tests, invoices
or bills relied upon by the plaintiff to support her

- contentions regarding alleged injuries.
2. Any other records or documents that the plaintiff possesses pertaining to her liability and damages claims.

(c) A computation of any category of damages claimed by the disclosing party, making available for inspection and copying under Rule 34 the documents or other evidentiary material, not privileged or protected from disclosure, on which such computation is based, including materials bearing on the nature and extent of injuries suffered.

To be provided by plaintiff.

- (d) Insurance Information:
Cambridge Integrated Services Group, Inc.
Limits of Liability: \$1,000,000 csl
Policy # to be provided under separate cover.

Defendants reserve their right to amend and/or supplement this response up to and including the time of trial.

Dated: Garden City, New York
March 5, 2008

BRAND GLICK & BRAND, PC
Attorneys for Defendants,
ELRAC, INC., d/b/a
ENTERPRISE-RENT-A-CAR
and JESSICA ORTIZ

By: 

Robert S. Mazzuchin (3655)
600 Old Country Road, Ste. 440
Garden City, New York 11530
(516) 746-3500
Our File No. 29-5233

To: The Law Offices of Daniel P. Buttafuoco
& Associates, PLLC
Mark T. Freeley, Esq.
Attorneys for Plaintiff, Ulderico Calero
144 Woodbury Road
Woodbury, New York 11797
516-746-8100

CIVIL NO.07 CV 10976

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BRAND GLICK & BRAND
Attorneys for Defendants,
ELRAC, INC., d/b/a ENTERPRISE-RENT-A-CAR and JESSICA ORTIZ
600 Old Country Road, Suite 440
Garden City, New York 11530
(516) 746-3500
Our File No. : 29-5233

To: Mark T. Freeley, Esq.
Attorneys for Plaintiff, Ulderico Calero
144 Woodbury Road
Woodbury, New York 11797

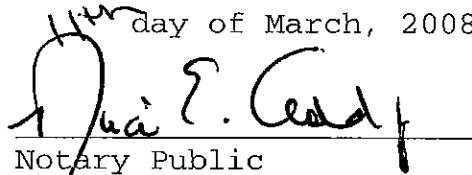
CERTIFICATE OF SERVICE

I HEREBY CERTIFY that, on **March 11th**, 2008, a copy of the
Defendants' Automatic Disclosure was furnished via Mail upon:

The Law Offices of Daniel P. Buttafuoco & Associates, PLLC
Mark T. Freeley, Esq.
Attorneys for Plaintiff, Ulderico Calero
144 Woodbury Road
Woodbury, New York 11797
516-746-8100


Cathy Janelle

Sworn to before me this
11th day of March, 2008


Notary Public

NINA E. GOLDBERG
Notary Public, State of New York
No. 4841330
Qualified in Nassau County
Commission Expires Sept. 30, 2009